

# **EXHIBIT N**



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

MICHAEL GONIDAKIS et al.,

Plaintiffs,

THE OHIO ORGANIZING  
COLLABORATIVE, COUNCIL ON  
AMERICAN-ISLAMIC RELATIONS, OHIO,  
OHIO ENVIRONMENTAL COUNCIL,  
SAMUEL GRESHAM JR., AHMAD  
ABOUKAR, MIKAYLA LEE, PRENTISS  
HANEY, PIERRETTE TALLEY, and  
CRYSTAL BRYANT,

Intervenor-Plaintiffs,

v.

FRANK LAROSE, in his official capacity,

Defendant.

Case No. 2:22-cv-00773

Circuit Judge Amul R. Thapar

Chief Judge Algenon L. Marbley

Judge Benjamin J. Beaton

Magistrate Judge Elizabeth Preston Deavers

**DECLARATION OF MIKAYLA LEE**



Mikayla Lee, having been duly sworn, deposes and states as follows:

1. I am over the age of eighteen years and reside in Columbus, Ohio, in House district 18 and Senate district 15 in the previous cycle's redistricting plan—the 2011 Plan. The matters set forth in this Declaration are based upon my personal knowledge.
2. I am an Ohio voter and registered to vote as a member of the Democratic Party. I am currently the Coordinated Campaign Operations Director for the Ohio Democratic Party. Previously, I worked for a nonpartisan and not-for-profit organization that helps young people, especially young Black Ohioans, run for office and served as the Vice President of the Ohio Young Black Democrats. I am active in my community, including engaging with voters and in other civic activities.
3. Based on my past and present political affiliations and activities, I plan to vote for and seek to elect Democratic candidates to state office in my district and throughout the State. I vote, campaign for, and support Democratic candidates because they are typically aligned with my policy preferences on a range of Ohio issues.
4. I have personally observed the ways in which the previous cycle's redistricting plan—the 2011 Plan's—gerrymandered districts directly impair the interests of Democratic voters like myself. The gerrymandered nature of the districts means that I, as a Democratic voter, would need to secure far more votes and support for my candidates and positions than a Republican voter would need to secure to alter or reform legislative policy. In short, by drawing maps to favor Republican candidates, the 2011 Plan gives greater value to a Republican vote than to my vote.



5. Additionally, the 2011 Plan has impaired my ability as a member of the Democratic Party to support a candidate by raising money, recruiting candidates, and mobilizing support. Part of my involvement in the political process in Ohio has involved engaging in efforts to recruit and aid young people to run for office as candidates. I have experienced difficulties in recruiting Democratic candidates because the 2011 Plan's gerrymander has dissuaded those individuals to run for office when there is a predetermined electoral outcome for their races or a Republican supermajority will not act on their proposed legislation. I have seen this issue particularly pronounced among people who associate and affiliate with the Ohio Democratic Party and who live in communities that generally share their values and policy interests, but who are drawn into General Assembly districts with a majority of Republican voters. Similarly, I have difficulty mobilizing fundraising and other support for Democratic candidates and the Democratic Party in such districts. I expect that these challenges will continue and be exacerbated under any other gerrymandered plan that this court adopts.

6. I have also observed that the 2011 Plan has made voters generally disaffected with and disengaged from the political process for the same reasons. I have observed an increase in political apathy among young voters and Democratic voters, who see that even when a majority of Ohio's voters support a policy position, that support does not result in legislative change. In my experience, voters become disaffected when they conclude that the electoral process systematically disfavors them.

7. When voters (and candidates) believe that map drawers have drawn district boundaries to disfavor Democratic candidates, their enthusiasm and willingness to spend time and money on electing Democratic candidates in disfavored districts is naturally diminished. By the same token, a Democrat running in "packed" district where his or her victory is assured may



have difficulty generating a sense of urgency or enthusiasm. Thus, gerrymandered districts burden my right to vote on equal terms with other Ohioans and burdens my and my party's ability to recruit and elect candidates to state office and to come together to advance political and policy goals.

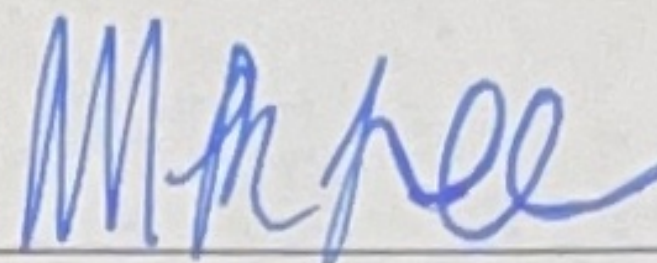
8. Regrettably, the Ohio Redistricting Commission did not comply with the Ohio Constitution when it adopted a plan on September 16, 2021. Despite the changes in Ohio's constitution, the Commission's plan was designed to produce the same partisan supermajority found in the 2011 Plan. I have expended substantial time and resources participating in a lawsuit before the Ohio Supreme Court challenging that unconstitutional plan and subsequent revisions to it. Implementing the 2011 Plan or some other similarly-gerrymandered plan—including one of the Commission plans invalidated by the Ohio Supreme Court—would undermine my efforts to guarantee that my vote counts as much as any other Ohioan's.

9. Furthermore, my state House and Senate districts under the 2011 Plan—18 and 15, respectively—are now overpopulated because of population shifts that occurred over the last decade. Hence, if I were forced to continue voting under the 2011 Plan, my vote would carry less weight than votes cast by Ohioans living in less populated districts. This malapportionment, like the 2011 Plan's gerrymander, therefore prevents me from receiving adequate representation before the General Assembly. As my testimony indicates, I have a significant interest in the



adoption of a General Assembly district plan that comports with the U.S. Constitution in addition to the Ohio Constitution.

10. I declare under penalty of perjury that the foregoing is true and correct.



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Mikayla Lee

Columbus, Ohio

April 6, 2022